



DAVID G. HOSENPUD
503.778.2141
hosenpudd@lanepowell.com

April 25, 2024

VIA BY ECF

The Honorable Louis L. Stanton
United States District Judge
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *Frontier Airlines v. AMCK Aviation, et al.*, Case No. 1:20-cv-09713-LLS

Dear Judge Stanton:

Trial in this matter was held before you from April 8, 2024 through April 17, 2024. The Court requested the parties to submit supplemental responses to the Court's two questions during summation. The parties understand those questions to be:

1. Even if the parties never reached a coherent waiver regarding rent payments on the 14 airplanes, and therefore the right to payment continued unimpaired, does AMCK still face liability under the law for its failure to provide Frontier with notice and an opportunity to cure?
2. If Frontier is awarded damages, should Frontier be reimbursed for its tax liability?

The parties have conferred and have agreed, with the Court's approval, to submit supplemental responses, no longer than six pages double-spaced, to the Court by May 2, 2024.

Respectfully,

LANE POWELL PC
s/ David G. Hosenpud
David G. Hosenpud
Attorneys for Plaintiff

CLIFFORD CHANCE US LLP
s/ Jeff E. Butler
Jeff E. Butler
Attorneys for Defendants

cc: Counsel of Record (via ECF)

022510.0155/9733403.2